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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RIYADH (AFFILIATE)

June 12, 2001

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Amendment of Section 73.606(b), Table of Allotments,
Television Broadcast Stations (International Falls and Chisholm, Minnesota),
MM Docket No. 01-87, RM-10092
Reply Comments of Channel 11 License, Inc.

Dear Ms. Salas:

Enclosed on behalf of Channel 11 License, Inc. ("Channel 11"), permittee of a new television station at International Falls, Minnesota, are an original and four copies of the reply comments of Channel 11 on the reallocation proposed by the Federal Communications Commission in the above-referenced proceeding. We also have enclosed a copy of this filing to be receipt-stamped and returned with our waiting messenger.

Sincerely,



Tom W. Davidson, Esq.
Natalie G. Roisman, Esq.

Enclosures

NGR/jj

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

JUN 12 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)	
)	
Amendment of Section 73.606(b))	MM Docket No. 01-87
Table of Allotments)	RM-10092
Television Broadcast Stations)	
(International Falls and)	
Chisholm, Minnesota).)	

To: Chief, Allocations Branch
Policy & Rules Division
Mass Media Bureau

REPLY COMMENTS OF CHANNEL 11 LICENSE, INC.

Channel 11 License, Inc. ("Channel 11 License") hereby submits the following reply comments in the above-referenced proceeding in support of the proposal of the Mass Media Bureau ("Bureau") of the Federal Communications Commission ("Commission") to amend the NTSC Table of Allotments, 47 C.F.R. § 73.606(b), by changing Channel 11 License's channel allotment from Channel 11, International Falls, Minnesota, to Channel 11, Chisholm, Minnesota.

As demonstrated in the comments filed by Channel 11 License in this proceeding, the proposed reallocation will result in a preferential arrangement of allotments by providing a first local television transmission service to Chisholm in accordance with the Commission's television allocation priorities, while not depriving International Falls of local television service. The new transmitter at Meadow Brook Ridge will provide city-grade coverage to Chisholm and will continue to provide grade B coverage to International Falls. Reallocating Channel 11 to Chisholm will result in a net increase in service to white areas and populations and will

substantially increase the amount of service to gray areas and populations. The proposed Chisholm allotment also will nearly double the U.S. land area covered by the station and will provide service to a population six times greater than the population that would be served by the International Falls allotment. Because a substantial amount of coverage from the proposed station location in International Falls would be in Canada, the relocation of the transmitter site to Meadow Brook Ridge would more efficiently cover areas and populations in the United States, given that only a small percentage of the coverage contour under the proposed Chisholm allocation covers Canada.


No party has filed comments in this proceeding in opposition to the proposed reallocation of Channel 11 to Chisholm. Furthermore, five parties have filed comments in support of the proposed reallocation. The Hibbing Area Chamber of Commerce, Saint Louis County, Balkan Township, the Chisholm Economic Development Authority, and the City of Chisholm all encouraged the Bureau to adopt the proposed allotment plan in order to improve access to local information and generate local news, increase job opportunities, and otherwise improve the economic profile of Chisholm and the surrounding communities. Once the Bureau adopts the proposed change in community of license, Channel 11 License will undertake promptly to modify its construction permit, build the specified facilities, and commence operation to serve these communities.

In view of the substantial gain in Grade B and first and second television service resulting from the proposed reallocation, without any corresponding loss of service, reallocation of Channel 11 from International Falls to Chisholm is in the public interest. The letters of unanimous support from the only other commenting parties also demonstrate that the proposed reallocation is in the public interest. For these reasons and the reasons set forth in the comments filed by Channel 11 License in this proceeding, Channel 11 License supports the instant proposal

and urges the Bureau to amend the television Table of Allotments, Section 73.606(b) of the Commission's rules, by changing the community of license of Channel 11, International Falls, Minnesota, to Channel 11, Chisholm, Minnesota.

Respectfully submitted,

CHANNEL 11 LICENSE, INC.

By: 
Tom W. Davidson, Esq.
Natalie G. Roisman, Esq.

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Dated: June 12, 2001